

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AON RISK SERVICES COMPANIES,
INC., AON PLC, and AON GROUP, INC.,

Plaintiffs,

v.

ALLIANT INSURANCE SERVICES, INC.,
TARA BRUSEK, JAMES JANIC,
THOMAS LUBAS, DANIELLE ROSS,
JAMIE TAYLOR, JOSHUA VICK, and
MATTHEW WALSH,

Defendants.

Case No. 1:19-cv-07312

Hon. Jorge L. Alonso

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and this Court's Standing Order pertaining to protective orders, Plaintiffs Aon Risk Services Companies, Inc., Aon PLC, and Aon Group, Inc. ("Plaintiffs") and Defendants Alliant Insurance Services, Inc., Tara Brusek, James Janic, Thomas Lubas, Danielle Ross, Jamie Taylor, Joshua Vick, and Matthew Walsh ("Defendants"), through their undersigned counsel, hereby jointly move for the entry of a protective order governing discovery in this action. In support of this motion, the parties state as follows:

1. On November 5, 2019, Plaintiffs filed their Complaint in this action, alleging, among other things, claims for misappropriation of trade secrets against its competitor Alliant Insurance Services, Inc. ("Alliant") and former employees who left their employment with Aon and are now working at Alliant.
2. Given the nature of Plaintiffs' claims, discovery in this action is likely to

involve the production of competitively sensitive information, including purported confidential information and trade secrets. Accordingly, the parties contend that good cause exists for the entry of an order to preserve the confidentiality of material disclosed in discovery.

3. The parties have met and conferred, and have come to an agreement on a Proposed Agreed Confidentiality Order. A copy of the parties' Proposed Agreed Confidentiality Order is attached hereto as Exhibit A.

4. In accordance with this Court's standing order, attached as Exhibit B is a "redline" document comparing the parties Proposed Agreed Confidentiality Order to the "Northern District of Illinois Model Confidentiality Order Form." Exhibit B also contains comments from counsel explaining the requested additions to and deletions from the Model Confidentiality Order.

WHEREFORE, the parties respectfully request that this Court enter the parties' Proposed Agreed Confidentiality Order.

Dated: February 28, 2020

Respectfully Submitted,

/s/ Patrick R. Duffey

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CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, which will transmit notice of such filing to all counsel of record.

/s/ Patrick R. Duffey
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